

REMARKS

Claims 1-13, 16-27, 33, 34, 36, 41-43, 48-53, 59, 66, and 124 are pending after entry of this Amendment. Claims 1, 23, 59, and 124 have been amended. Claims 1, 59, and 124 are the only independent claims pending.

The amendments to claims 1, 59, and 124 are supported in the specification, for example in paragraphs [0027] and [0091], in each of which the specified elemental analytical methods are disclosed. The amendment to claim 23 simply removes the word "about" in order to conform the scope of that claim to the scope of claim 1, from which it depends. Thus, the amendments made herein do not include new matter.

Please reconsider and withdraw the rejections in view of the foregoing amendments and the following remarks.

Objection to the Specification

The Examiner objects to paragraph [0048], line 1, of the specification for containing a typographical error. The specification has been amended to address the error. Reconsideration and withdrawal of the Examiner's objection are respectfully requested.

Claim Objections¹

The Examiner objects to the claims under 37 C.F.R. § 1.75(i) and M.P.E.P. § 608.01(m) for lacking line indentations between elements. Although the Applicants note that the language of 37 C.F.R. § 1.75(i) appears optional ("...**should** be separated...", emphasis added), the Applicants have nonetheless inserted line indentations between claim elements as requested by the Examiner, and this objection is believed to be moot.

The Examiner also objects to claim 23 for failing to limit the claims (17 and 1) from which it depends. The Applicants have deleted the word "about" from claim 23, and this amendment is believed to render this aspect of claim 23 co-extensive in scope with the claims from which it depends and is believed to render the Examiner's objection moot.

¹ Applicant's counsel thanks the Examiner for the clarifications provided during the telephone conference with Examiner held July 18, 2006.

Rejections Under 35 U.S.C. § 112

The claims stand rejected under § 112, first and second paragraphs. The Examiner alleges that the application fails to comply with each of the written description, enablement, and definiteness requirements of § 112 on account of purported deficiencies perceived by the Examiner regarding the analytical procedures to which the claims refer.

The Applicant believes that the Examiner's rejections pursuant to 35 U.S.C. § 112 all stem from a single fundamental misunderstanding on the Examiner's part: The Examiner appears to be unaware that the TCLP procedure is a standard procedure ("EPA Test Method 1311 - TCLP, Toxicity Characteristic Leaching Procedure") and was so at the time the application was filed. Copies of a brief informal description of the standard TCLP procedure prepared by the web service "Environmental Health & Safety Online" (www.EHSO.org) and the detailed TCLP protocol (dated July 1992) prepared by the U.S. Environmental Protection Agency are enclosed for the Examiner's consideration.

The specification identifies the TCLP procedure as the one used to assess elemental content of the mineralized ash filler. By way of example, the characteristic elemental concentrations in TCLP filtrate are identified in Table 1 (on page 21 of the specification, referenced in both paragraphs [0027] and [0091].) A skilled artisan would immediately recognize that the extraction fluid #1 specified in that procedure (see EPA Test Method 1311 at 5.7.1; also identified in the specification at paragraph [0091]) is a specified concentration of acetic acid in reagent grade water. A skilled artisan would also immediately recognize that the extraction conditions recited in paragraph [0027] of the specification are erroneous, both because the TCLP procedure is invariant and because those invariant procedures (use of the specified extraction fluid, 18 hour extraction period, 20 ml/g ratio of extraction fluid to solid sample) were the ones actually used in the examples in the specification (see, e.g., paragraph [0091]).

For the foregoing reasons, the Applicants respectfully contend that a skilled artisan would know precisely how to perform the TCLP analytical procedure recited in each of the independent claims, and that all of the pending claims are enabled and definite and were within the Applicants' possession at the time this application was filed.

In several comments in the Office Action, the Examiner suggests that the Applicants are attempting to add to the specification "essential material" in violation of 37 C.F.R. § 1.57(c). The Applicants respectfully respond that they are not attempting to incorporate any material by reference, but are instead attempting to demonstrate to the Examiner that the specification refers to the TCLP procedure that was, at the time this application was filed, a well known and explicitly defined analytical procedure. It is the Applicants' contention that because the TCLP procedure was so well known and specified in such detail in the prior art, no more detail is required in the specification than reference to that procedure.

Paragraph [0091] explicitly refers to EPA "document" SW-846 (which is actually a manual of procedures including many thousands of pages -- the reason the "document" SW-846 was not provided to the Examiner) and to the TCLP procedure within that document. In an attempt to demonstrate the availability of this information to the Examiner in a convenient way, the Applicants have included a pair of two-page World Wide Web printouts that demonstrate how a skilled artisan would find the TCLP procedure within SW-846. On the two-page document labeled (Circled "A"), one can look in the table of contents to find the TCLP procedure, and will find it listed in chapter 8, section 8.3, together with its assigned EPA procedure number (1311). In section 8.3, the assigned EPA procedure number (1311) is again listed. Using either of these sources, one follows the "1000 Series" link to find an index of 1000 series methods (included as the second document, labeled {Circled "B"}). Method 1311 is in that index, and can be found at the corresponding link (this is the source from which the enclosed copy of the protocol was obtained). Incidentally, EPA method 1312 (listed as an alternative methodology in paragraph [0091] of the specification) also appears in the same index. Similar paper manuals are well known and available in the art.

For the sake of making the claims as clear as possible, the Applicants have amended each of the independent claims to specify the elemental analyses (EPA methods 200.7 and 245.1) employed. Those standard methods are recited, for example, in both paragraphs [0027] and [0091] of the specification.

For all of the foregoing reasons, the Applicants respectfully contend that a skilled artisan in this field would have no question regarding how the analysis recited in the pending claims is to be performed. Neither would the skilled artisan fail to recognize that the Applicants were in possession of the invention that they now claim at the time the application was filed. The Applicants respectfully contend that the claims satisfy the written description, enablement, and definiteness requirements of 35 U.S.C. § 112 and request reconsideration and withdrawal of the Examiner's rejections based on that section.

Summary

The Applicant respectfully contends that each of claims 1-13, 16-27, 33, 34, 36, 41-43, 48-53, 59, 66, and 124 is in condition for allowance. Consideration of each of the claims and issuance of a Notice of Allowance are requested at the earliest possible time.

Respectfully submitted,

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Enclosures: "Hazardous Waste Fact Sheet: TCLP..."
EPA Standard Method 1311 -- TCLP
2-Page Document Labeled (Circled "A")
2-Page Document Labeled (Circled "B")

Hazardous Waste Fact Sheet: TCLP: Toxicity Characteristic Leaching Procedure and Characteristic Hazardous Wastes

Provided by EHSO: <http://www.EHSO.com>

The TCLP: Toxicity Characteristic Leaching Procedure

The TCLP, or Toxicity Characteristic Leaching (not Leachate) Procedure is designed to determine the mobility of both organic and inorganic analytes present in liquid, solid, and multiphasic wastes. This is usually used to determine if a waste may meet the definition of EP Toxicity, that is, carrying a hazardous waste code under RCRA (40 CFR Part 261) of D004 through D052. As it is the generator's responsibility to make this determination, but generators often contract outside labs to perform the TCLP test, these questions and answers may be helpful to generators. For this reason and sometimes in cleanup actions, businesses are often asked to perform an analysis on their waste using the TCLP. The Code of Federal Regulations (CFR) 40 CFR §261.24, outlines the 40 contaminants the TCLP analysis tests for (See Table 1—Maximum Concentration of Contaminants for Toxicity Characteristic). If a "Solid Waste" fails the test for one or more of these compounds, the waste is considered to be a characteristic hazardous waste – unless there is an exemption that applies. Bear in mind, too, that a characteristic waste may still also be a "listed" hazardous waste.

What does the TCLP Analysis Show?

The TCLP analysis simulates landfill conditions. Over time, water and other liquids percolate through landfills. The percolating liquid often reacts with the solid waste in the landfill, and may pose public and environmental health risks because of the contaminants it absorbs. The TCLP analysis determines which of the contaminants identified by the United States Environmental Protection Agency (EPA) are present in the leachate and their concentrations.

Who Performs the TCLP?

There are many businesses, in almost every state, who can perform these analysis. Look in the yellow pages under "Laboratories—Analytical". Many laboratories will offer courier services for a nominal fee, and provide sampling containers and a chain of custody form. Businesses in remote areas should contact the nearest lab to discuss sampling protocol and sample preparation for transportation. Improper sample handling can result in unreliable test results and wasted money!

What does it cost?

The cost of the TCLP depends on the laboratory and location; but typically, a full TCLP analysis may cost as much as \$3,000.

When is a Waste Hazardous?

A waste is considered hazardous when it exhibits one or more of the following characteristics:

- **Ignitable** (Flashpoint <140 °F)
- **Corrosive** (aqueous pH < 2 or > 12.5)
- **Reactive** (normally unstable, undergoes violent changes without detonating, water reactive)
- **Toxic** (exceeding the regulatory limits for contaminants under the TCLP or "7-11 test" analysis)
- **OR** it is "Listed" in the CFR (wastes which are pre-defined and categorized)

For the purposes of this fact sheet, a waste is considered hazardous due to toxicity if it exhibits results exceeding the regulatory limits outlined in Table 1 above. There are many exclusions and exemptions within the CFR. For this reason, call the your state EPA (DEP, DER, etc.) or talk to your hazardous waste inspector if you have ANY questions!

Table 1—Maximum Concentration of Contaminants for Toxicity Characteristic

EPA HW #	Contaminant	Regulatory Level (mg/l)
D004	Arsenic (As)	5.0
D005	Barium (Ba)	100.0
D018	Benzene	0.5
D006	Cadmium (Cd)	1.0
D019	Carbon Tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium (Cr)	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Cresol	200.0
D016	2,4-D	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrin	0.02
D031	Heptachlor	0.008
D032	Hexachlorobenzene	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead (Pb)	5.0
D013	Lindane	0.4
D009	Mercury (Hg)	0.2
D014	Methoxychlor	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium (Se)	1.0
D011	Silver (Ag)	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)	1.0
D043	Vinyl Chloride	0.2

EXAMPLES

Auto Repair:

An auto repair shop uses "hi-flash" mineral spirits as parts washing solvent. The solvent does not contain any halogenated or listed solvents. When the solvent becomes dirty, it is distilled. The solvent extracted from the distillation is placed back into use, and the "still bottoms" or contaminants from the solvent extraction are the waste product. This waste product must be tested by an analytical laboratory before it is discarded. The laboratory performs the "7-11 test", and the results indicate the following:

Lead	0.8 mg/l
Cadmium	0.5 mg/l
Chromium	8.0 mg/l

Looking at the table on the front of this fact sheet, lead and cadmium exhibit concentrations below regulatory levels. Chromium exceeds regulatory levels. The still bottoms exhibit toxicity due to high chromium levels, and would be considered a hazardous waste D007.

Auto Body:

The exhaust filters in the spray booth have become saturated with overspray from paint application. Since the body shop uses many different types of paints and primers, its difficult to determine if the filters are hazardous without an analysis. A representative filter is removed and sampled. The remaining filters are placed into containers and marked "filters pending analysis". The laboratory performs the "7-11 test", and the results indicate the following:

Lead	9.1 mg/l
Chromium	0.4 mg/l
Barium	0.85 mg/l
Methyl ethyl ketone (MEK)	10 mg/l

Only lead exceeded the regulatory levels. The exhaust filters are deemed hazardous due to lead toxicity, and referred to as a D008 waste. The business owner remembered that he used a special primer a friend gave him. After looking at the Material Safety Data Sheet (MSDS), the business owner found out why the filters failed the test. The special primer contained high amounts of lead. Six months later, the filters need changing again. The business owner had kept detailed records of all the paints and primers sprayed, along with the total quantities since the last filter change out. Another analysis was performed, and the analytical report indicated all of the contaminants were well below the regulatory limits. The filters were not found to exhibit any characteristics of toxicity, and were allowed to be handled as regular municipal solid waste. Because the business owner maintained detailed records, further testing would not be required unless the types of paint and primers changed.

General Manufacturing:

The QRM company receives large steel components which they re-manufacture. The process requires them to dismantle the components, and surface prepare the outer housings for re-finishing. The metal components are placed into a sand blasting cabinet, and cleaned with special high pressure media. After months of use, the blasting media became ineffective, and needed to be replaced. The old blasting material was placed into a metal drum, and labeled "used blasting media pending analysis". A representative sample was taken to the laboratory for the "7-11 test" analysis. The results are:

Arsenic	0.5 mg/l
Barium	10 mg/l
Cadmium	2.0 mg/l
Chromium	15.0 mg/l
Lead	25 mg/l

This analysis reported Cadmium, Chromium and Lead in excess of regulatory limits. The blaster media waste would be classified as toxic due to high concentrations of Cadmium D006, Chromium D007 and Lead D008. This waste would be labeled as a D006, D007, D008 hazardous waste.

For more information on this and many other environmental, health and safety subjects, such as where to find a list of labs, go online to <http://www.ehso.com> . Our full alphabetized table of contents is found at <http://www.ehso.com/contents.php> .

METHOD 1311

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

1.0 SCOPE AND APPLICATION

1.1 The TCLP is designed to determine the mobility of both organic and inorganic analytes present in liquid, solid, and multiphasic wastes.

1.2 If a total analysis of the waste demonstrates that individual analytes are not present in the waste, or that they are present but at such low concentrations that the appropriate regulatory levels could not possibly be exceeded, the TCLP need not be run.

1.3 If an analysis of any one of the liquid fractions of the TCLP extract indicates that a regulated compound is present at such high concentrations that, even after accounting for dilution from the other fractions of the extract, the concentration would be above the regulatory level for that compound, then the waste is hazardous and it is not necessary to analyze the remaining fractions of the extract.

1.4 If an analysis of extract obtained using a bottle extractor shows that the concentration of any regulated volatile analyte exceeds the regulatory level for that compound, then the waste is hazardous and extraction using the ZHE is not necessary. However, extract from a bottle extractor cannot be used to demonstrate that the concentration of volatile compounds is below the regulatory level.

2.0 SUMMARY OF METHOD

2.1 For liquid wastes (*i.e.*, those containing less than 0.5% dry solid material), the waste, after filtration through a 0.6 to 0.8 μm glass fiber filter, is defined as the TCLP extract.

2.2 For wastes containing greater than or equal to 0.5% solids, the liquid, if any, is separated from the solid phase and stored for later analysis; the particle size of the solid phase is reduced, if necessary. The solid phase is extracted with an amount of extraction fluid equal to 20 times the weight of the solid phase. The extraction fluid employed is a function of the alkalinity of the solid phase of the waste. A special extractor vessel is used when testing for volatile analytes (see Table 1 for a list of volatile compounds). Following extraction, the liquid extract is separated from the solid phase by filtration through a 0.6 to 0.8 μm glass fiber filter.

2.3 If compatible (*i.e.*, multiple phases will not form on combination), the initial liquid phase of the waste is added to the liquid extract, and these are analyzed together. If incompatible, the liquids are analyzed separately and the results are mathematically combined to yield a volume-weighted average concentration.

3.0 INTERFERENCES

3.1 Potential interferences that may be encountered during analysis are discussed in the individual analytical methods.

4.0 APPARATUS AND MATERIALS

4.1 Agitation apparatus: The agitation apparatus must be capable of rotating the extraction vessel in an end-over-end fashion (see Figure 1) at 30 ± 2 rpm. Suitable devices known to EPA are identified in Table 2.

4.2 Extraction Vessels

4.2.1 Zero-Headspace Extraction Vessel (ZHE). This device is for use only when the waste is being tested for the mobility of volatile analytes (i.e., those listed in Table 1). The ZHE (depicted in Figure 2) allows for liquid/solid separation within the device, and effectively precludes headspace. This type of vessel allows for initial liquid/solid separation, extraction, and final extract filtration without opening the vessel (see Section 4.3.1). The vessels shall have an internal volume of 500-600 mL, and be equipped to accommodate a 90-110 mm filter. The devices contain VITON[®] O-rings which should be replaced frequently. Suitable ZHE devices known to EPA are identified in Table 3.

For the ZHE to be acceptable for use, the piston within the ZHE should be able to be moved with approximately 15 psi or less. If it takes more pressure to move the piston, the O-rings in the device should be replaced. If this does not solve the problem, the ZHE is unacceptable for TCLP analyses and the manufacturer should be contacted.

The ZHE should be checked for leaks after every extraction. If the device contains a built-in pressure gauge, pressurize the device to 50 psi, allow it to stand unattended for 1 hour, and recheck the pressure. If the device does not have a built-in pressure gauge, pressurize the device to 50 psi, submerge it in water, and check for the presence of air bubbles escaping from any of the fittings. If pressure is lost, check all fittings and inspect and replace O-rings, if necessary. Retest the device. If leakage problems cannot be solved, the manufacturer should be contacted.

Some ZHEs use gas pressure to actuate the ZHE piston, while others use mechanical pressure (see Table 3). Whereas the volatiles procedure (see Section 7.3) refers to pounds per square inch (psi), for the mechanically actuated piston, the pressure applied is measured in torque-inch-pounds. Refer to the manufacturer's instructions as to the proper conversion.

¹ VITON[®] is a trademark of Du Pont.

4.2.2 Bottle Extraction Vessel. When the waste is being evaluated using the nonvolatile extraction, a jar with sufficient capacity to hold the sample and the extraction fluid is needed. Headspace is allowed in this vessel.

The extraction bottles may be constructed from various materials, depending on the analytes to be analyzed and the nature of the waste (see Section 4.3.3). It is recommended that borosilicate glass bottles be used instead of other types of glass, especially when inorganics are of concern. Plastic bottles, other than polytetrafluoroethylene, shall not be used if organics are to be investigated. Bottles are available from a number of laboratory suppliers. When this type of extraction vessel is used, the filtration device discussed in Section 4.3.2 is used for initial liquid/solid separation and final extract filtration.

4.3 Filtration Devices: It is recommended that all filtrations be performed in a hood.

4.3.1 Zero-Headspace Extractor Vessel (ZHE): When the waste is evaluated for volatiles, the zero-headspace extraction vessel described in Section 4.2.1 is used for filtration. The device shall be capable of supporting and keeping in place the glass fiber filter and be able to withstand the pressure needed to accomplish separation (50 psi).

NOTE: When it is suspected that the glass fiber filter has been ruptured, an in-line glass fiber filter may be used to filter the material within the ZHE.

4.3.2 Filter Holder: When the waste is evaluated for other than volatile analytes, any filter holder capable of supporting a glass fiber filter and able to withstand the pressure needed to accomplish separation may be used. Suitable filter holders range from simple vacuum units to relatively complex systems capable of exerting pressures of up to 50 psi or more. The type of filter holder used depends on the properties of the material to be filtered (see Section 4.3.3). These devices shall have a minimum internal volume of 300 mL and be equipped to accommodate a minimum filter size of 47 mm (filter holders having an internal capacity of 1.5 L or greater, and equipped to accommodate a 142 mm diameter filter, are recommended). Vacuum filtration can only be used for wastes with low solids content (<10%) and for highly granular, liquid-containing wastes. All other types of wastes should be filtered using positive pressure filtration. Suitable filter holders known to EPA are shown in Table 4.

4.3.3 Materials of Construction: Extraction vessels and filtration devices shall be made of inert materials which will not leach or absorb waste components. Glass, polytetrafluoroethylene (PTFE), or type 316 stainless steel equipment may be used when evaluating the mobility of both organic and inorganic components. Devices made of high density polyethylene (HDPE), polypropylene (PP), or polyvinyl chloride (PVC) may be used only when evaluating the mobility of metals. Borosili-

cate glass bottles are recommended for use over other types of glass bottles, especially when inorganics are analytes of concern.

4.4 Filters: Filters shall be made of borosilicate glass fiber, shall contain no binder materials, and shall have an effective pore size of 0.6 to 0.8 μm , or equivalent. Filters known to EPA which meet these specifications are identified in Table 5. Pre-filters must not be used. When evaluating the mobility of metals, filters shall be acid-washed prior to use by rinsing with 1N nitric acid followed by three consecutive rinses with deionized distilled water (a minimum of 1 L per rinse is recommended). Glass fiber filters are fragile and should be handled with care.

4.5 pH Meters: The meter should be accurate to ± 0.05 units at 25 °C.

4.6 ZHE Extract Collection Devices: TEDLAR^{®2} bags or glass, stainless steel or PTFE gas-tight syringes are used to collect the initial liquid phase and the final extract of the waste when using the ZHE device. The devices listed are recommended for use under the following conditions:

4.6.1 If a waste contains an aqueous liquid phase or if a waste does not contain a significant amount of nonaqueous liquid (i.e., <1% of total waste), the TEDLAR[®] bag or a 600 mL syringe should be used to collect and combine the initial liquid and solid extract.

4.6.2 If a waste contains a significant amount of nonaqueous liquid in the initial liquid phase (i.e., >1% of total waste), the syringe or the TEDLAR[®] bag may be used for both the initial solid/liquid separation and the final extract filtration. However, analysts should use one or the other, not both.

4.6.3 If the waste contains no initial liquid phase (is 100% solid) or has no significant solid phase (is 100% liquid), either the TEDLAR[®] bag or the syringe may be used. If the syringe is used, discard the first 5 mL of liquid expressed from the device. The remaining aliquots are used for analysis.

4.7 ZHE Extraction Fluid Transfer Devices: Any device capable of transferring the extraction fluid into the ZHE without changing the nature of the extraction fluid is acceptable (e.g., a positive displacement or peristaltic pump, a gas tight syringe, pressure filtration unit (see Section 4.3.2), or other ZHE device).

4.8 Laboratory Balance: Any laboratory balance accurate to within ± 0.01 grams may be used (all weight measurements are to be within ± 0.1 grams).

4.9 Beaker or Erlenmeyer flask, glass, 500 mL.

² TEDLAR[®] is a registered trademark of Du Pont.

4.10 Watchglass, appropriate diameter to cover beaker or Erlenmeyer flask.

4.11 Magnetic stirrer.

5.0 REAGENTS

5.1 Reagent grade chemicals shall be used in all tests. Unless otherwise indicated, it is intended that all reagents shall conform to the specifications of the Committee on Analytical Reagents of the American Chemical Society, where such specifications are available. Other grades may be used, provided it is first ascertained that the reagent is of sufficiently high purity to permit its use without lessening the accuracy of the determination.

5.2 Reagent Water. Reagent water is defined as water in which an interferant is not observed at or above the method's detection limit of the analyte(s) of interest. For nonvolatile extractions, ASTM Type II water or equivalent meets the definition of reagent water. For volatile extractions, it is recommended that reagent water be generated by any of the following methods. Reagent water should be monitored periodically for impurities.

5.2.1 Reagent water for volatile extractions may be generated by passing tap water through a carbon filter bed containing about 500 grams of activated carbon (Calgon Corp., Filtrasorb-300 or equivalent).

5.2.2 A water purification system (Millipore Super-Q or equivalent) may also be used to generate reagent water for volatile extractions.

5.2.3 Reagent water for volatile extractions may also be prepared by boiling water for 15 minutes. Subsequently, while maintaining the water temperature at 90 ± 5 degrees C, bubble a contaminant-free inert gas (e.g. nitrogen) through the water for 1 hour. While still hot, transfer the water to a narrow mouth screw-cap bottle under zero-headspace and seal with a Teflon-lined septum and cap.

5.3 Hydrochloric acid (1N), HCl, made from ACS reagent grade.

5.4 Nitric acid (1N), HNO₃, made from ACS reagent grade.

5.5 Sodium hydroxide (1N), NaOH, made from ACS reagent grade.

5.6 Glacial acetic acid, CH₃CH₂OOH, ACS reagent grade.

5.7 Extraction fluid.

5.7.1 Extraction fluid # 1: Add 5.7 mL glacial CH₃CH₂OOH to 500 mL of reagent water (See Section 5.2), add 64.3 mL of 1N NaOH, and dilute to a volume of 1 liter. When correctly prepared, the pH of this fluid will be 4.93 ± 0.05 .

5.7.2 Extraction fluid # 2: Dilute 5.7 mL glacial $\text{CH}_3\text{CH}_2\text{OOH}$ with reagent water (See Section 5.2) to a volume of 1 liter. When correctly prepared, the pH of this fluid will be 2.88 ± 0.05 .

NOTE: These extraction fluids should be monitored frequently for impurities. The pH should be checked prior to use to ensure that these fluids are made up accurately. If impurities are found or the pH is not within the above specifications, the fluid shall be discarded and fresh extraction fluid prepared.

5.8 Analytical standards shall be prepared according to the appropriate analytical method.

6.0 SAMPLE COLLECTION, PRESERVATION, AND HANDLING

6.1 All samples shall be collected using an appropriate sampling plan.

6.2 The TCLP may place requirements on the minimal size of the field sample, depending upon the physical state or states of the waste and the analytes of concern. An aliquot is needed for preliminary evaluation of which extraction fluid is to be used for the nonvolatile analyte extraction procedure. Another aliquot may be needed to actually conduct the nonvolatile extraction (see Section 1.4 concerning the use of this extract for volatile organics). If volatile organics are of concern, another aliquot may be needed. Quality control measures may require additional aliquots. Further, it is always wise to collect more sample just in case something goes wrong with the initial attempt to conduct the test.

6.3 Preservatives shall not be added to samples before extraction.

6.4 Samples may be refrigerated unless refrigeration results in irreversible physical change to the waste. If precipitation occurs, the entire sample (including precipitate) should be extracted.

6.5 When the waste is to be evaluated for volatile analytes, care shall be taken to minimize the loss of volatiles. Samples shall be collected and stored in a manner intended to prevent the loss of volatile analytes (e.g., samples should be collected in Teflon-lined septum capped vials and stored at 4 °C. Samples should be opened only immediately prior to extraction).

6.6 TCLP extracts should be prepared for analysis and analyzed as soon as possible following extraction. Extracts or portions of extracts for metallic analyte determinations must be acidified with nitric acid to a pH < 2, unless precipitation occurs (see Section 7.2.14 if precipitation occurs). Extracts should be preserved for other analytes according to the guidance given in the individual analysis methods. Extracts or portions of extracts for organic analyte determinations shall not be allowed to come into contact with the atmosphere (i.e., no headspace) to prevent losses. See Section 8.0 (QA requirements) for acceptable sample and extract holding times.

7.0 PROCEDURE

7.1 Preliminary Evaluations

Perform preliminary TCLP evaluations on a minimum 100 gram aliquot of waste. This aliquot may not actually undergo TCLP extraction. These preliminary evaluations include: (1) determination of the percent solids (Section 7.1.1); (2) determination of whether the waste contains insignificant solids and is, therefore, its own extract after filtration (Section 7.1.2); (3) determination of whether the solid portion of the waste requires particle size reduction (Section 7.1.3); and (4) determination of which of the two extraction fluids are to be used for the nonvolatile TCLP extraction of the waste (Section 7.1.4).

7.1.1 Preliminary determination of percent solids: Percent solids is defined as that fraction of a waste sample (as a percentage of the total sample) from which no liquid may be forced out by an applied pressure, as described below.

7.1.1.1 If the waste will obviously yield no liquid when subjected to pressure filtration (i.e., is 100% solids) proceed to Section 7.1.3.

7.1.1.2 If the sample is liquid or multiphasic, liquid/solid separation to make a preliminary determination of percent solids is required. This involves the filtration device described in Section 4.3.2 and is outlined in Sections 7.1.1.3 through 7.1.1.9.

7.1.1.3 Pre-weigh the filter and the container that will receive the filtrate.

7.1.1.4 Assemble the filter holder and filter following the manufacturer's instructions. Place the filter on the support screen and secure.

7.1.1.5 Weigh out a subsample of the waste (100 gram minimum) and record the weight.

7.1.1.6 Allow slurries to stand to permit the solid phase to settle. Wastes that settle slowly may be centrifuged prior to filtration. Centrifugation is to be used only as an aid to filtration. If used, the liquid should be decanted and filtered followed by filtration of the solid portion of the waste through the same filtration system.

7.1.1.7 Quantitatively transfer the waste sample to the filter holder (liquid and solid phases). Spread the waste sample evenly over the surface of the filter. If filtration of the waste at 4 °C reduces the amount of expressed liquid over what would be expressed at room temperature then allow the sample to warm up to room temperature in the device before filtering.

NOTE: If waste material (>1% of original sample weight) has obviously adhered to the container used to transfer the sample to the filtration apparatus, determine the weight of this residue and subtract it from the sample weight determined in Section 7.1.1.5 to determine the weight of the waste sample that will be filtered.

Gradually apply vacuum or gentle pressure of 1-10 psi, until air or pressurizing gas moves through the filter. If this point is not reached under 10 psi, and if no additional liquid has passed through the filter in any 2 minute interval, slowly increase the pressure in 10 psi increments to a maximum of 50 psi. After each incremental increase of 10 psi, if the pressurizing gas has not moved through the filter, and if no additional liquid has passed through the filter in any 2 minute interval, proceed to the next 10 psi increment. When the pressurizing gas begins to move through the filter, or when liquid flow has ceased at 50 psi (i.e., filtration does not result in any additional filtrate within any 2 minute period), stop the filtration.

NOTE: Instantaneous application of high pressure can degrade the glass fiber filter and may cause premature plugging.

7.1.1.8 The material in the filter holder is defined as the solid phase of the waste, and the filtrate is defined as the liquid phase.

NOTE: Some wastes, such as oily wastes and some paint wastes, will obviously contain some material that appears to be a liquid. Even after applying vacuum or pressure filtration, as outlined in Section 7.1.1.7, this material may not filter. If this is the case, the material within the filtration device is defined as a solid. Do not replace the original filter with a fresh filter under any circumstances. Use only one filter.

7.1.1.9 Determine the weight of the liquid phase by subtracting the weight of the filtrate container (see Section 7.1.1.3) from the total weight of the filtrate-filled container. Determine the weight of the solid phase of the waste sample by subtracting the weight of the liquid phase from the weight of the total waste sample, as determined in Section 7.1.1.5 or 7.1.1.7.

Record the weight of the liquid and solid phases. Calculate the percent solids as follows:

$$\text{Percent solids} = \frac{\text{Weight of solid (Section 7.1.1.9)}}{\text{Total weight of waste (Section 7.1.1.5 or 7.1.1.7)}} \times 100$$

7.1.2 If the percent solids determined in Section 7.1.1.9 is equal to or greater than 0.5%, then proceed either to Section 7.1.3 to

determine whether the solid material requires particle size reduction or to Section 7.1.2.1 if it is noticed that a small amount of the filtrate is entrained in wetting of the filter. If the percent solids determined in Section 7.1.1.9 is less than 0.5%, then proceed to Section 7.2.9 if the nonvolatile TCLP is to be performed and to Section 7.3 with a fresh portion of the waste if the volatile TCLP is to be performed.

7.1.2.1 Remove the solid phase and filter from the filtration apparatus.

7.1.2.2 Dry the filter and solid phase at 100 ± 20 °C until two successive weighing yield the same value within $\pm 1\%$. Record the final weight.

NOTE: Caution should be taken to ensure that the subject solid will not flash upon heating. It is recommended that the drying oven be vented to a hood or other appropriate device.

7.1.2.3 Calculate the percent dry solids as follows:

$$\text{Percent dry solids} = \frac{(\text{Wt. of dry waste + filter}) - \text{tared wt. of filter}}{\text{Initial wt. of waste (Section 7.1.1.5 or 7.1.1.7)}} \times 100$$

7.1.2.4 If the percent dry solids is less than 0.5%, then proceed to Section 7.2.9 if the nonvolatile TCLP is to be performed, and to Section 7.3 if the volatile TCLP is to be performed. If the percent dry solids is greater than or equal to 0.5%, and if the nonvolatile TCLP is to be performed, return to the beginning of this Section (7.1) and, with a fresh portion of waste, determine whether particle size reduction is necessary (Section 7.1.3) and determine the appropriate extraction fluid (Section 7.1.4). If only the volatile TCLP is to be performed, see the note in Section 7.1.4.

7.1.3 Determination of whether the waste requires particle size reduction (particle size is reduced during this step): Using the solid portion of the waste, evaluate the solid for particle size. Particle size reduction is required, unless the solid has a surface area per gram of material equal to or greater than 3.1 cm², or is smaller than 1 cm in its narrowest dimension (i.e., is capable of passing through a 9.5 mm (0.375 inch) standard sieve). If the surface area is smaller or the particle size larger than described above, prepare the solid portion of the waste for extraction by crushing, cutting, or grinding the waste to a surface area or particle size as described above. If the solids are prepared for organic volatiles extraction, special precautions must be taken (see Section 7.3.6).

NOTE: Surface area criteria are meant for filamentous (e.g., paper, cloth, and similar) waste materials. Actual measurement of surface area is not required, nor is it recommended. For materials that do not obviously meet

the criteria, sample specific methods would need to be developed and employed to measure the surface area. Such methodology is currently not available.

7.1.4 Determination of appropriate extraction fluid: If the solid content of the waste is greater than or equal to 0.5% and if the sample will be extracted for nonvolatile constituents (Section 7.2), determine the appropriate fluid (Section 5.7) for the nonvolatiles extraction as follows:

NOTE: TCLP extraction for volatile constituents uses only extraction fluid #1 (Section 5.7.1). Therefore, if TCLP extraction for nonvolatiles is not required, proceed to Section 7.3.

7.1.4.1 Weigh out a small subsample of the solid phase of the waste, reduce the solid (if necessary) to a particle size of approximately 1 mm in diameter or less, and transfer 5.0 grams of the solid phase of the waste to a 500 mL beaker or Erlenmeyer flask.

7.1.4.2 Add 96.5 mL of reagent water to the beaker, cover with a watchglass, and stir vigorously for 5 minutes using a magnetic stirrer. Measure and record the pH. If the pH is <5.0, use extraction fluid #1. Proceed to Section 7.2.

7.1.4.3 If the pH from Section 7.1.4.2 is >5.0, add 3.5 mL 1N HCl, slurry briefly, cover with a watchglass, heat to 50 °C, and hold at 50 °C for 10 minutes.

7.1.4.4 Let the solution cool to room temperature and record the pH. If the pH is <5.0, use extraction fluid #1. If the pH is >5.0, use extraction fluid #2. Proceed to Section 7.2.

7.1.5 If the aliquot of the waste used for the preliminary evaluation (Sections 7.1.1 - 7.1.4) was determined to be 100% solid at Section 7.1.1.1, then it can be used for the Section 7.2 extraction (assuming at least 100 grams remain), and the Section 7.3 extraction (assuming at least 25 grams remain). If the aliquot was subjected to the procedure in Section 7.1.1.7, then another aliquot shall be used for the volatile extraction procedure in Section 7.3. The aliquot of the waste subjected to the procedure in Section 7.1.1.7 might be appropriate for use for the Section 7.2 extraction if an adequate amount of solid (as determined by Section 7.1.1.9) was obtained. The amount of solid necessary is dependent upon whether a sufficient amount of extract will be produced to support the analyses. If an adequate amount of solid remains, proceed to Section 7.2.10 of the nonvolatile TCLP extraction.

7.2 Procedure When Volatiles are not Involved

A minimum sample size of 100 grams (solid and liquid phases) is recommended. In some cases, a larger sample size may be appropriate, depending on the

solids content of the waste sample (percent solids, See Section 7.1.1), whether the initial liquid phase of the waste will be miscible with the aqueous extract of the solid, and whether inorganics, semivolatile organics, pesticides, and herbicides are all analytes of concern. Enough solids should be generated for extraction such that the volume of TCLP extract will be sufficient to support all of the analyses required. If the amount of extract generated by a single TCLP extraction will not be sufficient to perform all of the analyses, more than one extraction may be performed and the extracts from each combined and aliquoted for analysis.

7.2.1 If the waste will obviously yield no liquid when subjected to pressure filtration (*i.e.*, is 100% solid, see Section 7.1.1), weigh out a subsample of the waste (100 gram minimum) and proceed to Section 7.2.9.

7.2.2 If the sample is liquid or multiphasic, liquid/solid separation is required. This involves the filtration device described in Section 4.3.2 and is outlined in Sections 7.2.3 to 7.2.8.

7.2.3 Pre-weigh the container that will receive the filtrate.

7.2.4 Assemble the filter holder and filter following the manufacturer's instructions. Place the filter on the support screen and secure. Acid wash the filter if evaluating the mobility of metals (see Section 4.4).

NOTE: Acid washed filters may be used for all nonvolatile extractions even when metals are not of concern.

7.2.5 Weigh out a subsample of the waste (100 gram minimum) and record the weight. If the waste contains <0.5% dry solids (Section 7.1.2), the liquid portion of the waste, after filtration, is defined as the TCLP extract. Therefore, enough of the sample should be filtered so that the amount of filtered liquid will support all of the analyses required of the TCLP extract. For wastes containing >0.5% dry solids (Sections 7.1.1 or 7.1.2), use the percent solids information obtained in Section 7.1.1 to determine the optimum sample size (100 gram minimum) for filtration. Enough solids should be generated by filtration to support the analyses to be performed on the TCLP extract.

7.2.6 Allow slurries to stand to permit the solid phase to settle. Wastes that settle slowly may be centrifuged prior to filtration. Use centrifugation only as an aid to filtration. If the waste is centrifuged, the liquid should be decanted and filtered followed by filtration of the solid portion of the waste through the same filtration system.

7.2.7 Quantitatively transfer the waste sample (liquid and solid phases) to the filter holder (see Section 4.3.2). Spread the waste sample evenly over the surface of the filter. If filtration of the waste at 4 °C reduces the amount of expressed liquid over what would be expressed at

room temperature, then allow the sample to warm up to room temperature in the device before filtering.

NOTE: If waste material (>1% of the original sample weight) has obviously adhered to the container used to transfer the sample to the filtration apparatus, determine the weight of this residue and subtract it from the sample weight determined in Section 7.2.5, to determine the weight of the waste sample that will be filtered.

Gradually apply vacuum or gentle pressure of 1-10 psi, until air or pressurizing gas moves through the filter. If this point is not reached under 10 psi, and if no additional liquid has passed through the filter in any 2 minute interval, slowly increase the pressure in 10 psi increments to a maximum of 50 psi. After each incremental increase of 10 psi, if the pressurizing gas has not moved through the filter, and if no additional liquid has passed through the filter in any 2 minute interval, proceed to the next 10 psi increment. When the pressurizing gas begins to move through the filter, or when the liquid flow has ceased at 50 psi (i.e., filtration does not result in any additional filtrate within a 2 minute period), stop the filtration.

NOTE: Instantaneous application of high pressure can degrade the glass fiber filter and may cause premature plugging.

7.2.8 The material in the filter holder is defined as the solid phase of the waste, and the filtrate is defined as the liquid phase. Weigh the filtrate. The liquid phase may now be either analyzed (See Section 7.2.12) or stored at 4 °C until time of analysis.

NOTE: Some wastes, such as oily wastes and some paint wastes, will obviously contain some material that appears to be a liquid. Even after applying vacuum or pressure filtration, as outlined in Section 7.2.7, this material may not filter. If this is the case, the material within the filtration device is defined as a solid and is carried through the extraction as a solid. Do not replace the original filter with a fresh filter under any circumstances. Use only one filter.

7.2.9 If the waste contains <0.5% dry solids (see Section 7.1.2), proceed to Section 7.2.13. If the waste contains >0.5% dry solids (see Section 7.1.1 or 7.1.2), and if particle size reduction of the solid was needed in Section 7.1.3, proceed to Section 7.2.10. If the waste as received passes a 9.5 mm sieve, quantitatively transfer the solid material into the extractor bottle along with the filter used to separate the initial liquid from the solid phase, and proceed to Section 7.2.11.

7.2.10 Prepare the solid portion of the waste for extraction by crushing, cutting, or grinding the waste to a surface area or particle size as described in Section 7.1.3. When the surface area or particle size has been appropriately altered, quantitatively transfer the solid

material into an extractor bottle. Include the filter used to separate the initial liquid from the solid phase.

NOTE: Sieving of the waste is not normally required. Surface area requirements are meant for filamentous (e.g., paper, cloth) and similar waste materials. Actual measurement of surface area is not recommended. If sieving is necessary, a Teflon coated sieve should be used to avoid contamination of the sample.

7.2.11 Determine the amount of extraction fluid to add to the extractor vessel as follows:

$$\text{Weight of extraction fluid} = \frac{20 \times \text{percent solids (Section 7.1.1)} \times \text{weight of waste filtered (Section 7.2.5 or 7.2.7)}}{100}$$

Slowly add this amount of appropriate extraction fluid (see Section 7.1.4) to the extractor vessel. Close the extractor bottle tightly (it is recommended that Teflon tape be used to ensure a tight seal), secure in rotary agitation device, and rotate at 30 ± 2 rpm for 18 ± 2 hours. Ambient temperature (i.e., temperature of room in which extraction takes place) shall be maintained at 23 ± 2 °C during the extraction period.

NOTE: As agitation continues, pressure may build up within the extractor bottle for some types of wastes (e.g., limed or calcium carbonate containing waste may evolve gases such as carbon dioxide). To relieve excess pressure, the extractor bottle may be periodically opened (e.g., after 15 minutes, 30 minutes, and 1 hour) and vented into a hood.

7.2.12 Following the 18 ± 2 hour extraction, separate the material in the extractor vessel into its component liquid and solid phases by filtering through a new glass fiber filter, as outlined in Section 7.2.7. For final filtration of the TCLP extract, the glass fiber filter may be changed, if necessary, to facilitate filtration. Filter(s) shall be acid-washed (see Section 4.4) if evaluating the mobility of metals.

7.2.13 Prepare the TCLP extract as follows:

7.2.13.1 If the waste contained no initial liquid phase, the filtered liquid material obtained from Section 7.2.12 is defined as the TCLP extract. Proceed to Section 7.2.14.

7.2.13.2 If compatible (e.g., multiple phases will not result on combination), combine the filtered liquid resulting from Section 7.2.12 with the initial liquid phase of the waste obtained in Section 7.2.7. This combined liquid is defined as the TCLP extract. Proceed to Section 7.2.14.

7.2.13.3 If the initial liquid phase of the waste, as obtained from Section 7.2.7, is not or may not be compatible with the filtered liquid resulting from Section 7.2.12, do not combine these liquids. Analyze these liquids, collectively defined as the TCLP extract, and combine the results mathematically, as described in Section 7.2.14.

7.2.14 Following collection of the TCLP extract, the pH of the extract should be recorded. Immediately aliquot and preserve the extract for analysis. Metals aliquots must be acidified with nitric acid to pH <2. If precipitation is observed upon addition of nitric acid to a small aliquot of the extract, then the remaining portion of the extract for metals analyses shall not be acidified and the extract shall be analyzed as soon as possible. All other aliquots must be stored under refrigeration (4 °C) until analyzed. The TCLP extract shall be prepared and analyzed according to appropriate analytical methods. TCLP extracts to be analyzed for metals shall be acid digested except in those instances where digestion causes loss of metallic analytes. If an analysis of the undigested extract shows that the concentration of any regulated metallic analyte exceeds the regulatory level, then the waste is hazardous and digestion of the extract is not necessary. However, data on undigested extracts alone cannot be used to demonstrate that the waste is not hazardous. If the individual phases are to be analyzed separately, determine the volume of the individual phases (to $\pm 0.5\%$), conduct the appropriate analyses, and combine the results mathematically by using a simple volume-weighted average:

$$\text{Final Analyte Concentration} = \frac{(V_1) (C_1) + (V_2) (C_2)}{V_1 + V_2}$$

where:

V_1 = The volume of the first phase (L).

C_1 = The concentration of the analyte of concern in the first phase (mg/L).

V_2 = The volume of the second phase (L).

C_2 = The concentration of the analyte of concern in the second phase (mg/L).

7.2.15 Compare the analyte concentrations in the TCLP extract with the levels identified in the appropriate regulations. Refer to Section 8.0 for quality assurance requirements.

7.3 Procedure When Volatiles are Involved

Use the ZHE device to obtain TCLP extract for analysis of volatile compounds only. Extract resulting from the use of the ZHE shall not be used to evaluate the mobility of nonvolatile analytes (e.g., metals, pesticides, etc.).

The ZHE device has approximately a 500 mL internal capacity. The ZHE can thus accommodate a maximum of 25 grams of solid (defined as that fraction of a

sample from which no additional liquid may be forced out by an applied pressure of 50 psi), due to the need to add an amount of extraction fluid equal to 20 times the weight of the solid phase.

Charge the ZHE with sample only once and do not open the device until the final extract (of the solid) has been collected. Repeated filling of the ZHE to obtain 25 grams of solid is not permitted.

Do not allow the waste, the initial liquid phase, or the extract to be exposed to the atmosphere for any more time than is absolutely necessary. Any manipulation of these materials should be done when cold (4 °C) to minimize loss of volatiles.

7.3.1 Pre-weigh the (evacuated) filtrate collection container (See Section 4.6) and set aside. If using a TEDLAR® bag, express all liquid from the ZHE device into the bag, whether for the initial or final liquid/solid separation, and take an aliquot from the liquid in the bag for analysis. The containers listed in Section 4.6 are recommended for use under the conditions stated in Sections 4.6.1 - 4.6.3.

7.3.2 Place the ZHE piston within the body of the ZHE (it may be helpful first to moisten the piston O-rings slightly with extraction fluid). Adjust the piston within the ZHE body to a height that will minimize the distance the piston will have to move once the ZHE is charged with sample (based upon sample size requirements determined from Section 7.3, Section 7.1.1 and/or 7.1.2). Secure the gas inlet/outlet flange (bottom flange) onto the ZHE body in accordance with the manufacturer's instructions. Secure the glass fiber filter between the support screens and set aside. Set liquid inlet/outlet flange (top flange) aside.

7.3.3 If the waste is 100% solid (see Section 7.1.1), weigh out a subsample (25 gram maximum) of the waste, record weight, and proceed to Section 7.3.5.

7.3.4 If the waste contains < 0.5% dry solids (Section 7.1.2), the liquid portion of waste, after filtration, is defined as the TCLP extract. Filter enough of the sample so that the amount of filtered liquid will support all of the volatile analyses required. For wastes containing \geq 0.5% dry solids (Sections 7.1.1 and/or 7.1.2), use the percent solids information obtained in Section 7.1.1 to determine the optimum sample size to charge into the ZHE. The recommended sample size is as follows:

7.3.4.1 For wastes containing < 5% solids (see Section 7.1.1), weigh out a 500 gram subsample of waste and record the weight.

7.3.4.2 For wastes containing \geq 5% solids (see Section 7.1.1), determine the amount of waste to charge into the ZHE as follows:

$$\text{Weight of waste to charge ZHE} = \frac{25}{\text{percent solids (Section 7.1.1)}} \times 100$$

Weigh out a subsample of the waste of the appropriate size and record the weight.

7.3.5 If particle size reduction of the solid portion of the waste was required in Section 7.1.3, proceed to Section 7.3.6. If particle size reduction was not required in Section 7.1.3, proceed to Section 7.3.7.

7.3.6 Prepare the waste for extraction by crushing, cutting, or grinding the solid portion of the waste to a surface area or particle size as described in Section 7.1.3. Wastes and appropriate reduction equipment should be refrigerated, if possible, to 4 °C prior to particle size reduction. The means used to effect particle size reduction must not generate heat in and of itself. If reduction of the solid phase of the waste is necessary, exposure of the waste to the atmosphere should be avoided to the extent possible.

NOTE: Sieving of the waste is not recommended due to the possibility that volatiles may be lost. The use of an appropriately graduated ruler is recommended as an acceptable alternative. Surface area requirements are meant for filamentous (e.g., paper, cloth) and similar waste materials. Actual measurement of surface area is not recommended.

When the surface area or particle size has been appropriately altered, proceed to Section 7.3.7.

7.3.7 Waste slurries need not be allowed to stand to permit the solid phase to settle. Do not centrifuge wastes prior to filtration.

7.3.8 Quantitatively transfer the entire sample (liquid and solid phases) quickly to the ZHE. Secure the filter and support screens onto the top flange of the device and secure the top flange to the ZHE body in accordance with the manufacturer's instructions. Tighten all ZHE fittings and place the device in the vertical position (gas inlet/outlet flange on the bottom). Do not attach the extract collection device to the top plate.

NOTE: If waste material (>1% of original sample weight) has obviously adhered to the container used to transfer the sample to the ZHE, determine the weight of this residue and subtract it from the sample weight determined in Section 7.3.4 to determine the weight of the waste sample that will be filtered.

Attach a gas line to the gas inlet/outlet valve (bottom flange) and, with the liquid inlet/outlet valve (top flange) open, begin applying gentle pressure of 1-10 psi (or more if necessary) to force all headspace

slowly out of the ZHE device into a hood. At the first appearance of liquid from the liquid inlet/outlet valve, quickly close the valve and discontinue pressure. If filtration of the waste at 4 °C reduces the amount of expressed liquid over what would be expressed at room temperature, then allow the sample to warm up to room temperature in the device before filtering. If the waste is 100% solid (see Section 7.1.1), slowly increase the pressure to a maximum of 50 psi to force most of the headspace out of the device and proceed to Section 7.3.12.

7.3.9 Attach the evacuated pre-weighed filtrate collection container to the liquid inlet/outlet valve and open the valve. Begin applying gentle pressure of 1-10 psi to force the liquid phase of the sample into the filtrate collection container. If no additional liquid has passed through the filter in any 2 minute interval, slowly increase the pressure in 10 psi increments to a maximum of 50 psi. After each incremental increase of 10 psi, if no additional liquid has passed through the filter in any 2 minute interval, proceed to the next 10 psi increment. When liquid flow has ceased such that continued pressure filtration at 50 psi does not result in any additional filtrate within a 2 minute period, stop the filtration. Close the liquid inlet/outlet valve, discontinue pressure to the piston, and disconnect and weigh the filtrate collection container.

NOTE: Instantaneous application of high pressure can degrade the glass fiber filter and may cause premature plugging.

7.3.10 The material in the ZHE is defined as the solid phase of the waste and the filtrate is defined as the liquid phase.

NOTE: Some wastes, such as oily wastes and some paint wastes, will obviously contain some material that appears to be a liquid. Even after applying pressure filtration, this material will not filter. If this is the case, the material within the filtration device is defined as a solid and is carried through the TCLP extraction as a solid.

If the original waste contained <0.5% dry solids (see Section 7.1.2), this filtrate is defined as the TCLP extract and is analyzed directly. Proceed to Section 7.3.15.

7.3.11 The liquid phase may now be either analyzed immediately (See Sections 7.3.13 through 7.3.15) or stored at 4 °C under minimal headspace conditions until time of analysis. Determine the weight of extraction fluid #1 to add to the ZHE as follows:

$$\text{Weight of extraction fluid} = \frac{20 \times \text{percent solids (Section 7.1.1)} \times \text{weight of waste filtered (Section 7.3.4 or 7.3.8)}}{100}$$

7.3.12 The following Sections detail how to add the appropriate amount of extraction fluid to the solid material within the ZHE and agitation of the ZHE vessel. Extraction fluid #1 is used in all cases (See Section 5.7).

7.3.12.1 With the ZHE in the vertical position, attach a line from the extraction fluid reservoir to the liquid inlet/outlet valve. The line used shall contain fresh extraction fluid and should be preflushed with fluid to eliminate any air pockets in the line. Release gas pressure on the ZHE piston (from the gas inlet/outlet valve), open the liquid inlet/outlet valve, and begin transferring extraction fluid (by pumping or similar means) into the ZHE. Continue pumping extraction fluid into the ZHE until the appropriate amount of fluid has been introduced into the device.

7.3.12.2 After the extraction fluid has been added, immediately close the liquid inlet/outlet valve and disconnect the extraction fluid line. Check the ZHE to ensure that all valves are in their closed positions. Manually rotate the device in an end-over-end fashion 2 or 3 times. Reposition the ZHE in the vertical position with the liquid inlet/outlet valve on top. Pressurize the ZHE to 5-10 psi (if necessary) and slowly open the liquid inlet/outlet valve to bleed out any headspace (into a hood) that may have been introduced due to the addition of extraction fluid. This bleeding shall be done quickly and shall be stopped at the first appearance of liquid from the valve. Re-pressurize the ZHE with 5-10 psi and check all ZHE fittings to ensure that they are closed.

7.3.12.3 Place the ZHE in the rotary agitation apparatus (if it is not already there) and rotate at 30 ± 2 rpm for 18 ± 2 hours. Ambient temperature (i.e., temperature of room in which extraction occurs) shall be maintained at 23 ± 2 °C during agitation.

7.3.13 Following the 18 ± 2 hour agitation period, check the pressure behind the ZHE piston by quickly opening and closing the gas inlet/outlet valve and noting the escape of gas. If the pressure has not been maintained (i.e., no gas release observed), the device is leaking. Check the ZHE for leaking as specified in Section 4.2.1, and perform the extraction again with a new sample of waste. If the pressure within the device has been maintained, the material in the extractor vessel is once again separated into its component liquid and solid phases. If the waste contained an initial liquid phase, the liquid may be filtered directly into the same filtrate collection container (i.e., TEDLAR® bag) holding the initial liquid phase of the waste. A separate filtrate collection container must be used if combining would create multiple phases, or there is not enough volume left within the filtrate collection container. Filter through the glass fiber filter, using the ZHE device as discussed in Section 7.3.9. All extract shall be filtered and collected if the

TEDLAR® bag is used, if the extract is multiphasic, or if the waste contained an initial liquid phase (see Sections 4.6 and 7.3.1).

NOTE: An in-line glass fiber filter may be used to filter the material within the ZHE if it is suspected that the glass fiber filter has been ruptured.

7.3.14 If the original waste contained no initial liquid phase, the filtered liquid material obtained from Section 7.3.13 is defined as the TCLP extract. If the waste contained an initial liquid phase, the filtered liquid material obtained from Section 7.3.13 and the initial liquid phase (Section 7.3.9) are collectively defined as the TCLP extract.

7.3.15 Following collection of the TCLP extract, immediately prepare the extract for analysis and store with minimal headspace at 4 °C until analyzed. Analyze the TCLP extract according to the appropriate analytical methods. If the individual phases are to be analyzed separately (i.e., are not miscible), determine the volume of the individual phases (to 0.5%), conduct the appropriate analyses, and combine the results mathematically by using a simple volume-weighted average:

$$\text{Final Analyte Concentration} = \frac{(V_1) (C_1) + (V_2) (C_2)}{V_1 + V_2}$$

where:

V_1 = The volume of the first phases (L).

C_1 = The concentration of the analyte of concern in the first phase (mg/L).

V_2 = The volume of the second phase (L).

C_2 = The concentration of the analyte of concern in the second phase (mg/L).

7.3.16 Compare the analyte concentrations in the TCLP extract with the levels identified in the appropriate regulations. Refer to Section 8.0 for quality assurance requirements.

8.0 QUALITY ASSURANCE

8.1 A minimum of one blank (using the same extraction fluid as used for the samples) must be analyzed for every 20 extractions that have been conducted in an extraction vessel.

8.2 A matrix spike shall be performed for each waste type (e.g., wastewater treatment sludge, contaminated soil, etc.) unless the result exceeds the regulatory level and the data are being used solely to demonstrate that the waste property exceeds the regulatory level. A minimum of one matrix spike must be analyzed for each analytical batch. As a minimum, follow the matrix spike addition guidance provided in each analytical method.

8.2.1 Matrix spikes are to be added after filtration of the TCLP extract and before preservation. Matrix spikes should not be added prior to TCLP extraction of the sample.

8.2.2 In most cases, matrix spikes should be added at a concentration equivalent to the corresponding regulatory level. If the analyte concentration is less than one half the regulatory level, the spike concentration may be as low as one half of the analyte concentration, but may not be less than five times the method detection limit. In order to avoid differences in matrix effects, the matrix spikes must be added to the same nominal volume of TCLP extract as that which was analyzed for the unspiked sample.

8.2.3 The purpose of the matrix spike is to monitor the performance of the analytical methods used, and to determine whether matrix interferences exist. Use of other internal calibration methods, modification of the analytical methods, or use of alternate analytical methods may be needed to accurately measure the analyte concentration in the TCLP extract when the recovery of the matrix spike is below the expected analytical method performance.

8.2.4 Matrix spike recoveries are calculated by the following formula:

$$\%R (\% \text{Recovery}) = 100 (X_s - X_u)/K$$

where:

X_s = measured value for the spiked sample,

X_u = measured value for the unspiked sample, and

K = known value of the spike in the sample.

8.3 All quality control measures described in the appropriate analytical methods shall be followed.

8.4 The use of internal calibration quantitation methods shall be employed for a metallic contaminant if: (1) Recovery of the contaminant from the TCLP extract is not at least 50% and the concentration does not exceed the regulatory level, and (2) The concentration of the contaminant measured in the extract is within 20% of the appropriate regulatory level.

8.4.1. The method of standard additions shall be employed as the internal calibration quantitation method for each metallic contaminant.

8.4.2 The method of standard additions requires preparing calibration standards in the sample matrix rather than reagent water or blank solution. It requires taking four identical aliquots of the solution and adding known amounts of standard to three of these aliquots. The fourth aliquot is the unknown. Preferably, the first addition should be prepared so that the resulting concentration is approximately 50% of the expected concentration of the sample. The second and third additions should be prepared so that the concentrations are approximately 100% and

150% of the expected concentration of the sample. All four aliquots are maintained at the same final volume by adding reagent water or a blank solution, and may need dilution adjustment to maintain the signals in the linear range of the instrument technique. All four aliquots are analyzed.

8.4.3 Prepare a plot, or subject data to linear regression, of instrument signals or external-calibration-derived concentrations as the dependant variable (y-axis) versus concentrations of the additions of standard as the independent variable (x-axis). Solve for the intercept of the abscissa (the independent variable, x-axis) which is the concentration in the unknown.

8.4.4 Alternately, subtract the instrumental signal or external-calibration-derived concentration of the unknown (unspiked) sample from the instrumental signals or external-calibration-derived concentrations of the standard additions. Plot or subject to linear regression of the corrected instrument signals or external-calibration-derived concentrations as the dependant variable versus the independent variable. Derive concentrations for unknowns using the internal calibration curve as if it were an external calibration curve.

8.5 Samples must undergo TCLP extraction within the following time periods:

SAMPLE MAXIMUM HOLDING TIMES [DAYS]				
	From: Field collection To: TCLP extraction	From: TCLP extraction To: Preparative extraction	From: Preparative extraction To: Determinative analysis	Total elapsed time
Volatiles	14	NA	14	28
Semi-volatiles	14	7	40	61
Mercury	28	NA	28	56
Metals, except mercury	180	NA	180	360

NA = Not applicable

If sample holding times are exceeded, the values obtained will be considered minimal concentrations. Exceeding the holding time is not acceptable in establishing that a waste does not exceed the regulatory level. Exceeding the holding time will not invalidate characterization if the waste exceeds the regulatory level.

9.0 METHOD PERFORMANCE

9.1 Ruggedness. Two ruggedness studies have been performed to determine the effect of various perturbations on specific elements of the TCLP protocol. Ruggedness testing determines the sensitivity of small procedural variations which might be expected to occur during routine laboratory application.

9.1.1 Metals - The following conditions were used when leaching a waste for metals analysis:

Varying Conditions	
Liquid/Solid ratio	19:1 vs. 21:1
Extraction time	16 hours vs. 18 hours
Headspace	20% vs. 60%
Buffer #2 acidity	190 meq vs. 210 meq
Acid-washed filters	yes vs. no
Filter type	0.7 μ m glass fiber vs. 0.45 μ m vs. polycarbonate
Bottle type	borosilicate vs. flint glass

Of the seven method variations examined, acidity of the extraction fluid had the greatest impact on the results. Four of 13 metals from an API separator sludge/electroplating waste (API/EW) mixture and two of three metals from an ammonia lime still bottom waste were extracted at higher levels by the more acidic buffer. Because of the sensitivity to pH changes, the method requires that the extraction fluids be prepared so that the final pH is within ± 0.05 units as specified.

9.1.2 Volatile Organic Compounds - The following conditions were used when leaching a waste for VOC analysis:

Varying Conditions	
Liquid/Solid ratio	19:1 vs. 21:1
Headspace	0% vs. 5%
Buffer #1 acidity	60 meq vs. 80 meq
Method of storing extract	Syringe vs. Tedlar® bag
Aliquotting	yes vs. no
Pressure behind piston	0 psi vs. 20 psi

None of the parameters had a significant effect on the results of the ruggedness test.

9.2 Precision. Many TCLP precision (reproducibility) studies have been performed, and have shown that, in general, the precision of the TCLP is comparable to or exceeds that of the EP toxicity test and that method precision is adequate. One of the more significant contributions to poor precision appears to be related to sample homogeneity and inter-laboratory variation (due to the nature of waste materials).

9.2.1 Metals - The results of a multi-laboratory study are shown in Table 6, and indicate that a single analysis of a waste may not be adequate for waste characterization and identification requirements.

9.2.2 Semi-Volatile Organic Compounds - The results of two studies are shown in Tables 7 and 8. Single laboratory precision was excellent with greater than 90 percent of the results exhibiting an RSD less than 25 percent. Over 85 percent of all individual compounds in the multi-laboratory study fell in the RSD range of 20 - 120 percent. Both studies concluded that the TCLP provides adequate precision. It was also determined that the high acetate content of the extraction fluid did not present problems (*i.e.*, column degradation of the gas chromatograph) for the analytical conditions used.

9.2.3 Volatile Organic Compounds - Eleven laboratories participated in a collaborative study of the use of the ZHE with two waste types which were fortified with a mixture of VOCs. The results of the collaborative study are shown in Table 9. Precision results for VOCs tend to occur over a considerable range. However, the range and mean RSD compared very closely to the same collaborative study metals results in Table 6. Blackburn and Show concluded that at the 95% level of significance: 1) recoveries among laboratories were statistically similar, 2) recoveries did not vary significantly between the two sample types, and 3) each laboratory showed the same pattern of recovery for each of the two samples.

10.0 REFERENCES

1. Blackburn, W.B. and Show, I. "Collaborative Study of the Toxicity Characteristics Leaching Procedure (TCLP)." Draft Final Report, Contract No. 68-03-1958, S-Cubed, November 1986.
2. Newcomer, L.R., Blackburn, W.B., Kimmell, T.A. "Performance of the Toxicity Characteristic Leaching Procedure." Wilson Laboratories, S-Cubed, U.S. EPA, December 1986.
3. Williams, L.R., Francis, C.W.; Maskarinec, M.P., Taylor D.R., and Rothman, N. "Single-Laboratory Evaluation of Mobility Procedure for Solid Waste." EMSL, ORNL, S-Cubed, ENSECO.

Table 1.
Volatile Analytes^{1,2}

Compound	CAS No.
Acetone	67-64-1
Benzene	71-43-2
n-Butyl alcohol	71-36-3
Carbon disulfide	75-15-0
Carbon tetrachloride	56-23-5
Chlorobenzene	108-90-7
Chloroform	67-66-3
1,2-Dichloroethane	107-06-2
1,1-Dichloroethylene	75-35-4
Ethyl acetate	141-78-6
Ethyl benzene	100-41-4
Ethyl ether	60-29-7
Isobutanol	78-83-1
Methanol	67-56-1
Methylene chloride	75-09-2
Methyl ethyl ketone	78-93-3
Methyl isobutyl ketone	108-10-1
Tetrachloroethylene	127-18-4
Toluene	108-88-3
1,1,1,-Trichloroethane	71-55-6
Trichloroethylene	79-01-6
Trichlorofluoromethane	75-69-4
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1
Vinyl chloride	75-01-4
Xylene	1330-20-7

¹ When testing for any or all of these analytes, the zero-headspace extractor vessel shall be used instead of the bottle extractor.

² Benzene, carbon tetrachloride, chlorobenzene, chloroform, 1,2-dichloroethane, 1,1-dichloroethylene, methyl ethyl ketone, tetrachloroethylene, and vinyl chloride are toxicity characteristic constituents.

Table 2.
Suitable Rotary Agitation Apparatus¹

Company	Location	Model No.
Analytical Testing and Consulting Services, Inc.	Warrington, PA (215) 343-4490	4-vessel extractor (DC20S) 8-vessel extractor (DC20) 12-vessel extractor (DC20B) 24-vessel extractor (DC24C)
Associated Design and Manufacturing Company	Alexandria, VA (703) 549-5999	2-vessel (3740-2-BRE) 4-vessel (3740-4-BRE) 6-vessel (3740-6-BRE) 8-vessel (3740-8-BRE) 12-vessel (3740-12-BRE) 24-vessel (3740-24-BRE)
Environmental Machine and Design, Inc.	Lynchburg, VA (804) 845-6424	8-vessel (08-00-00) 4-vessel (04-00-00)
IRA Machine Shop and Laboratory	Santurce, PR (809) 752-4004	8-vessel (011001)
Lars Lande Manufacturing	Whitmore Lake, MI (313) 449-4116	10-vessel (10VRE) 5-vessel (5VRE) 6-vessel (6VRE)
Millipore Corp.	Bedford, MA (800) 225-3384	4-ZHE or 4 2-liter bottle extractor (YT310RAHW)

¹ Any device that rotates the extraction vessel in an end-over-end fashion at 30 ± 2 rpm is acceptable.

Table 3.
Suitable Zero-Headspace Extractor Vessels¹

Company	Location	Model No.
Analytical Testing & Consulting Services, Inc.	Warrington, PA (215) 343-4490	C102, Mechanical Pressure Device
Associated Design and Manufacturing Company	Alexandria, VA (703) 549-5999	3745-ZHE, Gas Pressure Device
Lars Lande Manufacturing ²	Whitmore Lake, MI (313) 449-4116	ZHE-11, Gas Pressure Device
Millipore Corporation	Bedford, MA (800) 225-3384	YT30090HW, Gas Pressure Device
Environmental Machine and Design, Inc.	Lynchburg, VA (804) 845-6424	VOLA-TOX1, Gas Pressure Device
Gelman Science	Ann Arbor, MI (800) 521-1520	15400 Gas Pressure Device

¹ Any device that meets the specifications listed in Section 4.2.1 of the method is suitable.

² This device uses a 110 mm filter.

Table 4.
Suitable Filter Holders¹

Company	Location	Model/ Catalogue No.	Size
Nucleopore Corporation	Pleasanton, CA (800) 882-7711	425910	142 mm
		410400	47 mm
Micro Filtration Systems	Dublin, CA (800) 334-7132 (415) 828-6010	302400	142 mm
		311400	47 mm
Millipore Corporation	Bedford, MA (800) 225-3384	YT30142HW	142 mm
		XX1004700	47 mm

¹ Any device capable of separating the liquid from the solid phase of the waste is suitable, providing that it is chemically compatible with the waste and the constituents to be analyzed. Plastic devices (not listed above) may be used when only inorganic analytes are of concern. The 142 mm size filter holder is recommended.

Table 5.
Suitable Filter Media¹

Company	Location	Model	Pore Size (µm)
Millipore Corporation	Bedford, MA (800) 225-3384	AP40	0.7
Nucleopore Corporation	Pleasanton, CA (415) 463-2530	211625	0.7
Whatman Laboratory Products, Inc.	Clifton, NJ (201) 773-5800	GFF	0.7
Micro Filtration Systems	Dublin, CA (800) 334-7132 (415) 828-6010	GF75	0.7
Gelman Science	Ann Arbor, MI (800) 521-1520	66256 (90mm) 66257 (142mm)	0.7

¹ Any filter that meets the specifications in Section 4.4 of the Method is suitable.

Table 6. Multi-Laboratory TCLP Metals, Precision

Waste	Extraction Fluid	Metal	\bar{X}	S	%RSD
Ammonia Lime Still Bottoms	#1	Cadmium	0.053	0.031	60
	#2		0.023	0.017	76
	#1	Chromium	0.015	0.0014	93
	#2		0.0032	0.0037	118
	#1	Lead	0.0030	0.0027	90
	#2		0.0032	0.0028	87
API/EW Mixture	#1	Cadmium	0.0046	0.0028	61
	#2		0.0005	0.0004	77
	#1	Chromium	0.0561	0.0227	40
	#2		0.105	0.018	17
	#1	Lead	0.0031	0.0031	100
	#2		0.0124	0.0136	110
Fossil Fuel Fly Ash	#1	Cadmium	0.080	0.069	86
	#2		0.093	0.067	72
	#1	Chromium	0.017	0.014	85
	#2		0.070	0.040	57
	#1	Lead	0.0087	0.0074	85
	#2		0.0457	0.0083	18
%RSD Range = 17 - 118 Mean %RSD = 74					

NOTE: \bar{X} = Mean results from 6 - 12 different laboratories

Units = mg/L

Extraction Fluid #1 = pH 4.9

#2 = pH 2.9

Table 7. Single-Laboratory Semi-Volatiles, Precision

Waste	Compound	Extraction Fluid	\bar{X}	S	%RSD
Ammonia Lime Still Bottoms	Phenol	#1	19000	2230	11.6
		#2	19400	929	4.8
	2-Methylphenol	#1	2000	297	14.9
		#2	1860	52.9	2.8
	4-Methylphenol	#1	7940	1380	17.4
		#2	7490	200	2.7
	2,4-Dimethylphenol	#1	321	46.8	14.6
		#2	307	45.8	14.9
	Naphthalene	#1	3920	413	10.5
		#2	3827	176	4.6
	2-Methylnaphthalene	#1	290	44.8	15.5
		#2	273	19.3	7.1
	Dibenzofuran	#1	187	22.7	12.1
		#2	187	7.2	3.9
	Acenaphthylene	#1	703	89.2	12.7
		#2	663	20.1	3.0
	Fluorene	#1	151	17.6	11.7
		#2	156	2.1	1.3
	Phenanthrene	#1	241	22.7	9.4
		#2	243	7.9	3.3
	Anthracene	#1	33.2	6.19	18.6
		#2	34.6	1.55	4.5
	Fluoranthrene	#1	25.3	1.8	7.1
		#2	26.0	1.8	7.1
API/EW Mixture	Phenol	#1	40.7	13.5	33.0
		#2	19.0	1.76	9.3
	2,4-Dimethylphenol	#1	33.0	9.35	28.3
		#2	43.3	8.61	19.9
	Naphthalene	#1	185	29.4	15.8
		#2	165	24.8	15.0
	2-Methylnaphthalene	#1	265	61.2	23.1
		#2	200	18.9	9.5
%RSD Range = 1 - 33					
Mean %RSD = 12					

NOTE: Units = $\mu\text{g/L}$

Extractions were performed in triplicate

All results were at least 2x the detection limit

Extraction Fluid #1 = pH 4.9

#2 = pH 2.9

Table 8. Multi-Laboratory Semi-Volatiles, Precision

Waste	Compound	Extraction Fluid	\bar{X}	S	%RSD
Ammonia Lime	BNAs	#1	10043	7680	76.5
Still Bottoms (A)		#2	10376	6552	63.1
API/EW	BNAs	#1	1624	675	41.6
Mixture (B)		#2	2074	1463	70.5
Fossil Fuel	BNAs	#1	750	175	23.4
Fly Ash (C)		#2	739	342	46.3
Mean %RSD = 54					

NOTE: Units = $\mu\text{g/L}$

X = Mean results from 3 - 10 labs

Extraction Fluid #1 = pH 4.9

#2 = pH 2.9

%RSD Range for Individual Compounds

A, #1 0 - 113

A, #2 28 - 108

B, #1 20 - 156

B, #2 49 - 128

C, #1 36 - 143

C, #2 61 - 164

Table 9. Multi-Laboratory (11 Labs) VOCs, Precision

Waste	Compound	\bar{X}	S	%RSD
Mine Tailings	Vinyl chloride	6.36	6.36	100
	Methylene chloride	12.1	11.8	98
	Carbon disulfide	5.57	2.83	51
	1,1-Dichloroethene	21.9	27.7	127
	1,1-Dichloroethane	31.4	25.4	81
	Chloroform	46.6	29.2	63
	1,2-Dichloroethane	47.8	33.6	70
	2-Butanone	43.5	36.9	85
	1,1,1-Trichloroethane	20.9	20.9	100
	Carbon tetrachloride	12.0	8.2	68
	Trichloroethene	24.7	21.2	86
	1,1,2-Trichloroethene	19.6	10.9	56
	Benzene	37.9	28.7	76
	1,1,2,2-Tetrachloroethane	34.9	25.6	73
	Toluene	29.3	11.2	38
	Chlorobenzene	35.6	19.3	54
	Ethylbenzene	4.27	2.80	66
	Trichlorofluoromethane	3.82	4.40	115
	Acrylonitrile	76.7	110.8	144
Ammonia Lime Still Bottoms	Vinyl chloride	5.00	4.71	94
	Methylene chloride	14.3	13.1	92
	Carbon disulfide	3.37	2.07	61
	1,1-Dichloroethene	52.1	38.8	75
	1,1-Dichloroethane	52.8	25.6	49
	Chloroform	64.7	28.4	44
	1,2-Dichloroethane	43.1	31.5	73
	2-Butanone	59.0	39.6	67
	1,1,1-Trichloroethane	53.6	40.9	76
	Carbon tetrachloride	7.10	6.1	86
	Trichloroethene	57.3	34.2	60
	1,1,2-Trichloroethene	6.7	4.7	70
	Benzene	61.3	26.8	44
	1,1,2,2-Tetrachloroethane	3.16	2.1	66
	Toluene	69.0	18.5	27
	Chlorobenzene	71.8	12.0	17
	Ethylbenzene	3.70	2.2	58
	Trichlorofluoromethane	4.05	4.8	119
	Acrylonitrile	29.4	34.8	118
%RSD Range = 17 - 144				
Mean %RSD = 75				

NOTE: Units = $\mu\text{g/L}$

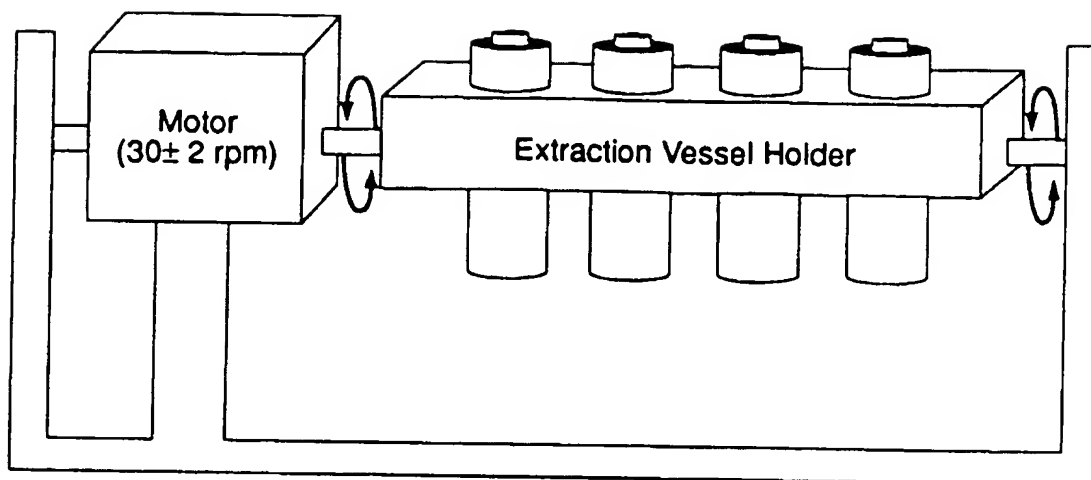


Figure 1. Rotary Agitation Apparatus

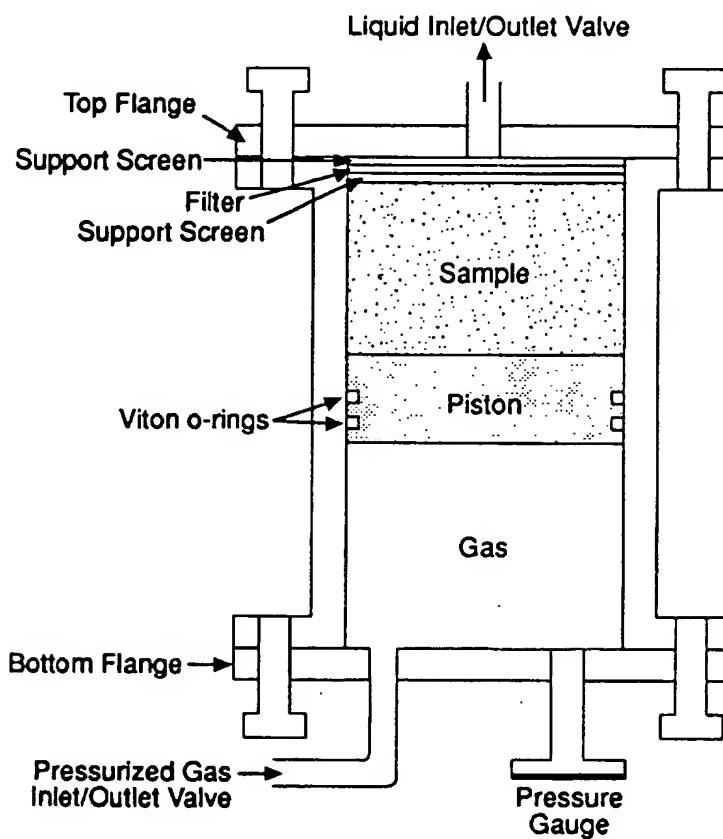
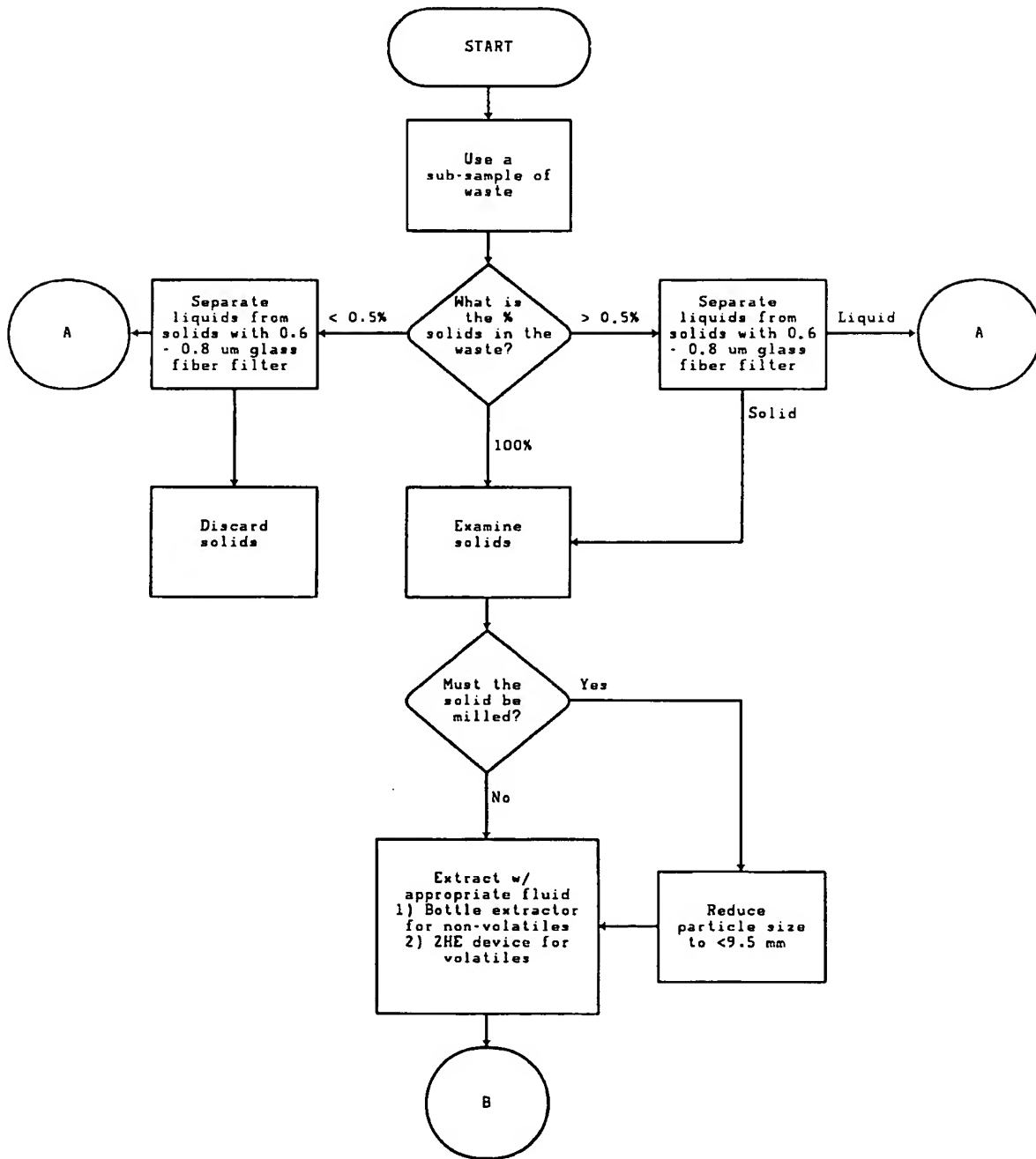


Figure 2. Zero-Headspace Extractor (ZHE)

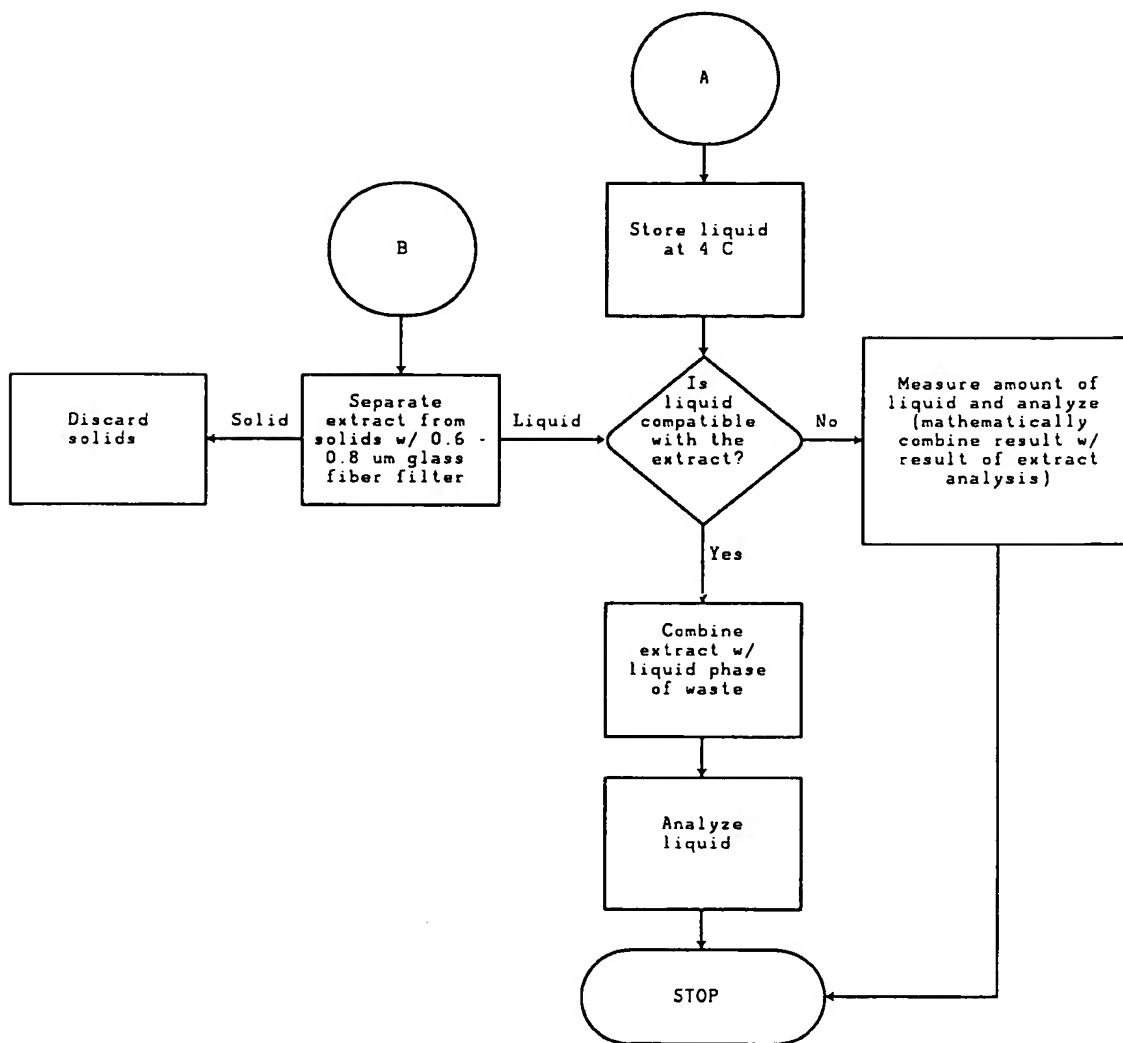
METHOD 1311

TOXICITY CHARACTERISTIC LEACHATE PROCEDURE



METHOD 1311 (CONTINUED)

TOXICITY CHARACTERISTIC LEACHATE PROCEDURE



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Table of Contents	1000 Series	5000 Series	8000 Series
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Table of Contents

- [Table of Contents](#) [PDF Format 183 KB]
- [Disclaimer](#) [PDF Format 23 KB]
- [Abstract](#) [PDF Format 132 KB]
- [Method Index and Conversion Table](#) [PDF Format 99 KB]
- [Methods Status Table](#) [PDF Format 165 KB]
- [Preface](#) [PDF Format 33 KB]
- [Acknowledgements](#) [PDF Format 47 KB]
- [Appendix -- Company References](#) [PDF Format 51 KB]

(Alternatively, look for TCLP method here - it is in chapter 8, section 8.3)

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[Back to Top](#)

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- [Chapter One -- Quality Control](#) [PDF Format 272 KB]

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- [Chapter Three -- Inorganic Analytes](#) [PDF Format 61 KB]
- [Chapter Four -- Organic Analytes](#) [PDF Format 101 KB]
- [Chapter Five -- Miscellaneous Test Methods](#) [PDF Format 81KB]
- [Chapter Six -- Properties](#) [PDF Format 67 KB]
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Table of Contents	1000 Series	5000 Series	8000 Series
Chapters	3000 Series	6000 Series	9000 Series
0010 - 0100	4000 Series	7000 Series	
Series			

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